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March 12, 2025

BY ECF

Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Keonne Rodriguez*, 24 Cr. 82 (RMB)

Dear Judge Berman:

We write on behalf of Keonne Rodriguez, the defendant in the above-referenced matter. A court conference is scheduled for 11:30 a.m. on Tuesday, March 18, 2025, and we would like to meet with Mr. Rodriguez before and after the conference. Accordingly, we respectfully request that Mr. Rodriguez be permitted to travel to New York on Sunday, March 16, and return to his home in the Western District of Pennsylvania on Wednesday, May 19. We have conferred with the Government and Pretrial Services, each of whom has no objection to this request.

If the Court grants this request, Mr. Rodriguez will provide Pretrial Services with his itinerary, including hotel information, in advance of travel. We are available to answer any questions the Court may have.

Respectfully submitted,

/s/ Michael Kim Krouse

Michael Kim Krouse

cc: AUSA Andrew Chan
AUSA David Felton
AUSA Cecilia Vogel